

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MELISSA HARTMAN, on behalf of  
herself and all those similarly situated,

Plaintiffs,

-against-

MEDICREDIT, INC., and JOHN DOES  
1-25

Defendants.

Civil Case Number: 2:15-cv-1596-MRH-MPK

**NOTICE OF MOTION FOR THE *PRO*  
*HAC VICE* ADMISSION OF YITZCHAK  
ZELMAN, ESQ.**

PLEASE TAKE NOTICE that on \_\_\_\_\_, 2016, or as soon thereafter as counsel may be heard, the undersigned attorney for Plaintiff Melissa Hartman, in the above captioned matter will move this Court for an Order admitting Yitzchak Zelman, Esq. of the law firm Marcus & Zelman, LLC at 1500 Allaire Avenue, Suite 101, Ocean, New Jersey 07712, *pro hac vice* pursuant to Local Civil Rule 83.2 B as counsel for Plaintiff Melissa Hartman in connection with all proceedings in this matter.

PLEASE TAKE FURTHER NOTICE that, in support of this application, the undersigned shall rely on the Certifications of Yitzchak Zelman, Esq., being filed and served herewith.

PLEASE TAKE FURTHER NOTICE that, a proposed form of Order is submitted herewith.

Dated: December 14, 2016

/s/ Mark Moynihan

Mark G. Moynihan Esq.

**MOYNIHAN LAW**

112 Washington Place, Suite 1-N  
Pittsburgh, PA 15219  
Telephone: (412) 889-8535  
Facsimile: (800) 997-8192

/s/ Yitzchak Zelman

Yitzchak Zelman, Esq.

Attorney I.D. #YZ5857

*(TO BE ADMITTED PRO HAC VICE)*

**MARCUS & ZELMAN, LLC**

1500 Allaire Avenue, Suite 101  
Ocean, New Jersey 07712  
(732) 695-3282 telephone  
(732) 298-6256 facsimile

***ATTORNEYS FOR PLAINTIFF***

**CERTIFICATION OF SERVICE**

I, Mark Moynihan, hereby certify that on December 14, 2016, I electronically filed the attached *Notice of Motion for the Admission of Yitzchak Zelman, Esq., Pro Hac Vice* and accompanying papers with the Clerk of the Court by using the Court's CM/ECF system, and accordingly served all parties who receive notice of the filing via the Court's CM/ECF system.

Dated: December 14, 2016

/s/ Mark Moynihan

Mark G. Moynihan Esq.